

PetroCom License Corporation

Report on

Implementation of Wireless E911 Phase II Automatic Location Identification

Background/Contact Information

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TRS 803550

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E911 Phase II Location Technology Information

PetroCom License Corporation ("PetroCom") is one of two carriers licensed by the Commission to provide cellular radio telephone service in the Gulf of Mexico Service Area ("GMSA"), an area exceeding 86,000 square miles. PetroCom's system currently provides coverage of the Gulf coastline from southern Texas to the border of Florida. Since receiving its license, PetroCom has constructed and operated an extensive network of cellular facilities from water-based platforms in the Gulf. The majority of PetroCom's cellular subscribers are oil and gas companies. Other businesses, service companies, and pleasure boat operators who need continuous cellular service while travelling outside their home system in coastal waters and beyond utilize PetroCom's system as roamers.

Currently, in accordance with the request of the United States Coast Guard, PetroCom routes all 911 calls made on its system to the Coast Guard United States Search and Rescue Operations in New Orleans, which screens the calls and acts as a Public Safety Answering Point (PSAP) to deploy emergency personnel. The unique aspects of cellular service in the Gulf dictate the method of this service. For example, the activities of PetroCom's cellular customers take place up to hundreds of miles offshore—far from the reach of any terrestrial

emergency service. Furthermore, unlike most land-based cellular systems, cellular operations in the Gulf cover a small population over a very large expanse of territory--an area in excess of 86,000 square miles. The one law enforcement agency with the resources and capability to identify, locate, and come to the rescue of an emergency in such a wide expanse of sea is the Coast Guard. PetroCom is therefore currently working with the Coast Guard in order to implement Phase II E911 into its emergency and rescue notification and response system.

After reviewing the available technology, PetroCom has concluded that a network-based technology is the only available option that is viable as a Phase II solution for PetroCom as of the date of this Report. To the best of PetroCom's knowledge, most of the major handset manufacturers have informed the FCC that they are unable to timely produce location capable handsets that meet the FCC's requirements or are compatible with PetroCom's system. As a result, PetroCom currently believes that it will use a combination of two technologies: Time Difference of Arrival ("TDOA") and Angle of Arrival ("AOA") technology position determining equipment.

TDOA uses multiple receivers that contain accurate timing sources. These receivers are located at cell sites. At least three receivers are required to locate a caller. The caller's mobile handset signal is received at the cell sites and time stamped. The difference in the time received at each of the cell sites is then used to calculate hyperbolic lines. The intersection of these lines provides an approximation of the caller's location. AOA uses specialized antennas located at the cell sites. The placement of the antennas determines the angle at which the mobile handset's signal is received at each antenna. The intersection of the angle at which the signal arrives at the cell sites provides an approximation of the caller's location. The combination of these technologies will likely be used throughout PetroCom's market. To implement these E911 technologies, PetroCom anticipates that modifications to its network and switching center may be necessary. At this time, however, PetroCom is unable to describe the nature of these modifications.

Testing and Verification

To date, PetroCom has not conducted any Phase II ALI equipment technology tests. As necessary, PetroCom will use tests based on established engineering and testing standards. Testing will be performed in accordance with FCC Guidelines for determining the accuracy of ALI solutions contained in OET Bulletin No. 71. Further, PetroCom will conduct any needed tests in cooperation with the Coast Guard.

Implementation Details and Schedule

PetroCom anticipates that both hardware and software changes to its system will be necessary to implement its chosen ALI solution. It is PetroCom's plan to acquire the needed hardware and software and install same in accordance with FCC rules. Once PetroCom finalizes its hardware and software choices and makes the necessary acquisitions, PetroCom, after consultation with the Coast Guard, will draft a deployment schedule and submit it to the FCC. PetroCom understands that FCC rules require deployment of a Phase II ALI system by the announced deadline, even if there is no system that fully meets the FCC's requirements.

PSAP Interface

When PetroCom incorporates its Phase II hardware and software changes into its system, it will work to make sure that those changes will enable the system to transmit Phase II data to the Coast Guard. The deployment schedule for this part of the system will be incorporated into PetroCom's overall Phase II deployment schedule and will be provided to the FCC at the same time.

Existing Handsets

Since PetroCom intends to deploy a network based technology as its Phase II solution, this section is inapplicable.

Location of Non-Compatible Handsets

Since PetroCom intends to deploy a network based technology as its Phase II solution, this section is inapplicable.

Other Information

To date, PetroCom has not received any requests for Phase II service from the Coast Guard or any other PSAP.